

*The Tonroe/Castletaylor (Ardrahan, Co.
Galway) Action Group against Air Pollution*

Ms Dorota Richards,
Programme Officer,
Office of Environmental Sustainability,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate
County Wexford

26th April 2022

Reg. No. E0007-01
PA Reg. Ref: AP13/20

Re: Appeal regarding a decision by Galway County Council to grant a licence (Ref: AP13/20 Under the Pollution Act 1987, as amended, to John Madden and Sons Limited for the operation of an asphalt plant at Tonroe, Ardrahan, County Galway

Dear Ms Richards,

I acknowledge receipt of yours of the 5th inst. in above matter.

We do not profess to have the capacity to offer a scientific analysis or a qualified judgement regarding the accuracy of a Natura Impact Statement which would inform the conservation objectives of the adjacent European sites. Neither do we have professional expertise which would qualify us to determine if any such Statement could realistically determine if the operation of an asphalt plant at the site under review is or is not likely to have a significant effect on, or affect the integrity of, the European sites identified in parallel with the above.

However, we wish to point out that the Ecological Desktop Study and Field Surveys which were undertaken in support of the planning application for the proposed industrial licence, were conducted in a normal and natural environment. They were not conducted under conditions associated with industrial activity capable of activating contaminating material which could give rise to environmental concerns.

It is our view that a more fitting opportunity to undertake an Appropriate Assessment of asphalt plant operations is when such a plant is operating at full or close to full capacity production. It is only at this point that tests and surveys can realistically determine the effect of industrial plant

Noreen O'Connor (Secretary)
Aoife Lynskey Keane (Chairperson)

Tonroe, Castletaylor, Ardrahan, Co. Galway
Tonroe, Castletaylor, Ardrahan, Co. Galway

operations on nearby European sites. In these circumstances, an operating Licence would already have been granted and any concerns or objections thereafter would have no impact or relevance in law.

If a temporary industrial licence were to be granted under the Air Pollution Act 1987, as amended, and regular unannounced inspections were carried out, the outcomes of these inspections alone may not guarantee that industrial asphalt operations are carried out within safety standard limitations or statutory guidelines.

Relying solely on some our own individual experiences, we believe that the materials used in the manufacture of tarmacadam will give rise to (i) fugitive dust emissions, (ii) bitumen fumes and (iii) various obnoxious emissions from the chimney stack of the asphalt plant. These, in turn, and with the assistance of air turbulence support, will impose upon and impact adversely on nearby European sites and, in particular, on the adjacent Ardrahan Grassland SAC. We also believe that the residue emissions from such an industrial plant will expose the residents of the many dwellings in that immediate area to a variety of health issues. In particular, such an active asphalt plant is likely to impose a very traumatic burden on the health of the many children and older persons in that locality.

As much as 100% of the raw materials proposed for use in the project will have to be harvested from sites many miles away. This, in itself, will cause much additional pollution to the local environment. A designated monitoring agency with responsibility for the oversight of this type of activity has not been identified.

It is accepted that the scope of this appeal is limited to matters relating to the control of air pollution. No compelling grounds or verifiable evidence have been produced or submitted to suggest or conclude that the proposed development would not seriously injure the amenities of the area or the totality of property in the vicinity of the plant site.

Until such time as there is in place, under statutory footing, an independent scientific mechanism for the monitoring of pollution control activities at industrial sites, human health and European site protection will remain at the mercy of the Gods.

Yours sincerely,



Noreen O'Connor
Secretary

Noreen O'Connor (Secretary)
Aoife Lynskey Keane (Chairperson)

Tonroe, Castletaylor, Ardrahan, Co. Galway
Tonroe, Castletaylor, Ardrahan, Co. Galway